

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

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ELLIOT BROIDY and BROIDY CAPITAL
MANAGEMENT, LLC,

Plaintiffs,

- against -

GLOBAL RISK ADVISORS LLC,
GRA MAVEN LLC,
GRA QUANTUM LLC,
GLOBAL RISK ADVISORS EMEA LIMITED,
GRA RESEARCH LLC,
QYRPT, INC.,
KEVIN CHALKER,
DENIS MANDICH,
ANTONIO GARCIA, and
COURTNEY CHALKER,

Defendants.
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Case No. 19-cv-11861

STIPULATION & PROPOSED ORDER

WHEREAS, Plaintiffs Elliott Broidy and Broidy Capital Management, LLC served their First Amended Complaint (“FAC”) (Dkt. 57) on Defendants Global Risk Advisors LLC, GRA Maven LLC, GRA Quantum LLC, Global Risk Advisors EMEA Limited, and Kevin Chalker (the “Original Defendants”) on June 26, 2020;

WHEREAS, newly named Defendants GRA Research LLC, Qyrpt, Inc., Denis Mandich, Antonio Garcia, and Courtney Chalker (the “Additional Defendants”) have not been served with the FAC, but have agreed to waive service of the FAC under Fed. R. Civ. P. 4(d);

WHEREAS, the Original Defendants’ time to answer or otherwise respond to the FAC is currently 14 days from June 26, 2020, or July 10, 2020;

WHEREAS, the Additional Defendants' time to answer or otherwise respond to the FAC is currently 60 days from June 30, 2020, or August 31, 2020;

WHEREAS, all parties have conducted negotiations concerning briefing for Defendants' anticipated motion(s) to dismiss the FAC;

WHEREAS, this is the parties' first request to extend the time of any filings related to the FAC;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for the parties in this action, as follows:

1. The time for Defendants to answer or otherwise respond to the amended complaint shall be extended to August 10, 2020.
2. The time for Plaintiffs to serve papers in opposition to any motion filed by Defendants pursuant to Federal Rule of Civil Procedure 12 shall be extended to September 21, 2020.
3. The time for Defendants to serve any reply papers in support of any motion filed pursuant to Federal Rule of Civil Procedure 12 shall be extended to October 5, 2020.
4. Nothing in this Stipulation shall prejudice any party's right to seek further relief from the Court concerning the time for filing and service of any answer or motion papers.
5. Nothing in this Stipulation shall be deemed or construed as an admission of the jurisdiction of this Court over this action or any parties therein, and all rights with respect to the same are hereby expressly reserved.

Dated: July 7, 2020

STEPTOE & JOHNSON LLP

/s/ Charles Michael¹

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Attorneys for Defendants

SO ORDERED

Dated: _____

The Honorable Mary Kay Vyskocil
United States District Court Judge

¹ Consent given in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.